

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
LIYOU XING,
on his own behalf and on behalf of others similarly situated
Plaintiff,

v.

MAYFLOWER INTERNATIONAL HOTEL GROUP INC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER BUSINESS GROUP, LLC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER INN CORPORATION
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER WENYU LLC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
YAN ZHI HOTEL MANAGEMENT INC.
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER 1-1 LLC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
YUEHUA HU,
WEI HONG HU a/k/a Weihong Hu, and
XIAOZHUANG GE

Defendants.
-----X

Case No. 18-cv-06616-PKC-LB

**DECLARATION OF JOHN
TROY IN SUPPORT OF
MOTION FOR LEAVE TO FILE
FIRST AMENDED
COMPLAINT**

I, John Troy, an attorney admitted to practice before the Bar of the State of New York and in this Court, declare under penalty of perjury that the following statements are true and correct:

1. I am the principal attorney of Troy Law, PLLC, attorney for Plaintiff LIYOU XING in this matter.
2. I submit this affirmation in support of Plaintiff's motion for leave to file their first amended complaint.
3. In support of this request I have filed a Motion for Leave to Amend, and a Memorandum of Law supporting that Motion.
4. The following exhibits are annexed to this declaration:

Exhibit 1. Plaintiff's proposed First Amended Complaint, with changes from the initial Complaint (redlined);

Exhibit 2. Plaintiff's proposed First Amended Complaint with Exhibits.

Exhibit 3. Plaintiff Yuanyuan Duan Consent to Become Party Plaintiff.

Exhibit 4. Plaintiff Hualiang Li Consent to Become Party Plaintiff.

Exhibit 5. Plaintiff Wingkit Loi Consent to Become Party Plaintiff.

Exhibit 6. Plaintiff Shuk C Ng-Lam Consent to Become Party Plaintiff.

Exhibit 7. Plaintiff Junhui Yan Consent to Become Party Plaintiff.

Exhibit 8. Plaintiff Junhua Yu Consent to Become Party Plaintiff.

Exhibit 9. Plaintiff Amanda Liu Consent to Become Party Plaintiff.

Dated: Flushing, NY
April 6, 2020

Respectfully submitted,

/s/ John Troy

John Troy, Esq.

TROY LAW, PLLC

41-25 Kissena Boulevard, Suite 103

Flushing, NY 11355

Tel: 718-762-1324

troylaw@troypllc.com

Attorneys for Plaintiff